

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPH ALESIA,)	
)	Case No. 19 cv 7576
Plaintiff,)	
v.)	Hon. John Z. Lee
)	
JAMIE RHEE, in her official capacity,)	Magistrate Judge Sidney I. Schenkier
<i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANTS' UNOPPOSED MOTION
FOR EXTENSION OF TIME TO ANSWER**

Defendants City of Chicago, Jaime Rhee, William Lonergan, Phyllinis Easter and Argentene Hrysykos, through their attorney, Celia Meza, Acting Corporation Counsel of the City of Chicago, move for an extension of time through April 16, 2021 to file their Answer to the Amended Complaint pursuant to Fed. R. Civ. P. 6(b)(1)(A). Plaintiff's counsel has no objection to this motion.

1. Plaintiff Joseph Alesia ("Alesia") filed an Amended Complaint alleging claims for retaliation under the Family and Medical Leave Act, as amended, 29 U.S.C. § 2601 *et seq.* and indemnification under Illinois law. Amended Complaint, CM/ECF # 36 at ¶¶ 27, 30. On March 17, 2021, this Court denied Defendants' Motion to Dismiss the Amended Complaint. Order, CM/ECF # 53. Pursuant to Rule 12(a)(4)(a), Defendants' Answer to the Amended Complaint is due to be filed on or before March 31, 2021.

2. For several reasons, Defendants' counsel requires additional time to properly prepare an Answer. Counsel is currently engaged in other matters with impending deadlines including the preparation and filing a responsive pleading by March 26, 2021 in the case of *Paternakos v. City of Chicago*, case no. 21 cv 0052; a reply brief to be filed by March 31, 2021

in the case of *Donald v. City of Chicago et al.*, case no. 20 cv 6815; taking and defending two depositions on March 30 and 31, prior to the close of discovery, in the case of *Harris v. City of Chicago*, case no. 19 cv 2229; and preparation of a responsive pleading by April 9, 2021 in the case of *Delaney v. Szewczyk*, Cook County case no. 21 L 2115.

3. Co-counsel on this matter, Amy Brammel, resigned from the City's Law Department on December 4, 2020. In addition, due to City budget constraints, the Employment Litigation Division of the City's Law Department is currently understaffed and its attorneys are operating under heavier-than-usual case loads.

4. Defendants request an additional 30 days, or through May 4, 2021 to file their Answer to the Amended Complaint.

For the foregoing reasons, Defendants City of Chicago, Jaime Rhee, William Lonergan, Phyllinis Easter and Argentene Hrysikos respectfully request an extension of time through through April 16, 2021 to file their Answer to the Amended Complaint and other relief the Court deems appropriate.

Dated: March 25, 2021

Respectfully submitted,

CELIA MEZA
Acting Corporation Counsel of the City of Chicago

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